

**REMARKS**

Claims 1-5 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ohta et al. (US 2001/0000439 A1) in view of Jenkins et al. (US 6,437,596 B1), Haddick et al. (US 6,536,871), and Yomogihara et al. (US 5,737,053); claims 11-15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Jeong et al. (US 6,486,494) in view of Jenkins et al., Haddick et al., and Rostoker et al. (US 5,565,385); claims 6-10 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Baek et al. (US 6,524,876) in view of Jenkins et al., Haddick et al., and Huddleston et al. (US 5,498,767); and claims 16-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Baek et al. in view of Jenkins et al., Rostoker et al., and Huddleston et al.

Applicants respectfully traverse all rejections as being based upon combinations of references that neither teach nor suggest the novel combination of features recited in independent claims 1, 6, 11, and 16, and hence dependent claims 2-5, 7-10, 12-15, and 17-20.

Independent claims 1 and 6 both recite a drive line, pad line, and pad such that the pad line extends “from the drive line at a first angle from the first direction” and the pad extends “at the first angle and connected to the pad line.” Similarly, independent claims 11 and 16 both recite a plurality of drive lines, pads, and pad lines such that the pads extend “at a first acute angle from an edge of the substrate” and the pad lines extend “at the first angle.” At least these features of independent claims 1, 6, 11, and 16 are neither taught nor suggested by Ohta et al., Jenkins et al., Haddick et al., Yomogihara et al., Jeong et al., Rostoker et al., Baek et al., and/or Huddleston et al., whether taken singly or combined.

The Office Action admits that Ohta et al. “fail to disclose the required pad structure, pad connection structure, and the pad/angle structure.” Thus, the Office Action relies upon Jenkins et al. for disclosing “integrated circuits for testing” a display area where the required pad structure is disclosed,” upon Haddick et al. for disclosing “a reliable flex circuit interconnect on inkjet print cartridge where the required pad connection structure is disclosed,” and upon Yomogihara et al. for disclosing “a wire substrate having branch lines perpendicular to the main lines in which the branch lines connect to driving circuits on a display device where the required pad/angle structure is disclosed.” As a result, the Office Action alleges that it would have been obvious to one having ordinary skill in the art at the time the invention was made “to include the required pad structure, pad connection and pad/angle structures in Ohta et al. as taught by Jenkins et al. Haddick et al., and Yomogihara et al. respectively [in] order to have a liquid crystal display device with better performance.”

However, Ohta et al., Jenkins et al., Haddick et al., Yomogihara et al., Jeong et al., Rostoker et al., Baek et al., and/or Huddleston et al., whether taken singly or combined, fail to teach or suggest providing a drive line, pad line, and pad such that the pad line extends “from the drive line at a first angle from the first direction” and the pad extends “at the first angle and connected to the pad line.” Similarly, none of Ohta et al., Jenkins et al., Haddick et al., Yomogihara et al., Jeong et al., Rostoker et al., Baek et al., and/or Huddleston et al., whether taken singly or combined, teaches or suggests providing “a plurality of pads extending at a first acute angle from an edge of the substrate” and “a plurality of pad lines extending at the first angle.”

Moreover, Applicants respectfully assert that the Office Action's alleged motivation to modify Jenkins et al., Haddick et al., Yomogihara et al., Jeong et al., Rostoker et al., Baek et al., and/or Huddleston et al. "in order to have a liquid crystal display device with better performance" is not taught or suggested in any of Ohta et al., Jenkins et al., Haddick et al., Yomogihara et al., Jeong et al., Rostoker et al., Baek et al., and/or Huddleston et al. Accordingly, Applicants respectfully note that MPEP 2143.01 instructs that "[o]bviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention, where there is some teaching, suggestion or motivation to do so found in either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art."

Moreover, MPEP 2143 instructs that "[t]he mere fact that references can be combined or modified does not render the resultant combination obvious unless that prior art also suggests the desirability of the combination. *In re Mills*, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990)." Thus, Applicants assert that the Office Action has not provided any motivation for one of ordinary skill in the art to modify any of the teachings of Ohta et al., Jenkins et al., Haddick et al., Yomogihara et al., Jeong et al., Rostoker et al., Baek et al., and/or Huddleston et al. to achieve the invention of independent claims 1, 6, 11, and 16.

Since the Office Action fails to meet the requirements for establishing a *prima facie* case of obviousness as to independent claims 1, 6, 11, and 16, claims 1, 6, 11, and 16 are not obvious. Further, since claims 2-5, 7-10, 12-15, and 17-20 depend from claims 1, 6, 11, and 16, respectively, and incorporate all the features of claims 1, 6, 11, and 16, claims 2-5, 7-10, 12-15, and 17-20 are not obvious at least for at least the above reasons for which independent claims 1,

6, 11, and 16 are not obvious. Thus, Applicants respectfully request that the rejections of claims 1-20 under 35 U.S.C. § 103(a) be withdrawn.

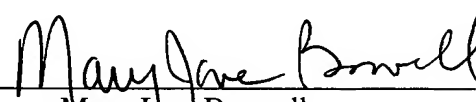
**Conclusion**

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and the timely allowance of the pending claims. Should the Examiner believe that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicants' undersigned representative to expedite prosecution.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of time under 37 C.F.R. § 1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

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